Esther S. Trakinski (ES 7791) Ira S. Sacks (IS 2861) Gursky & Partners, LLP 1350 Broadway, 11<sup>th</sup> Floor New York, NY 10018 (212) 904-1234 **Attorneys for Plaintiff** 

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X FULL CREATIVE, LTD. d/b/a I.C.B. ASIA, CO., LTD.,

Plaintiff,

- against -

NOTICE OF MOTION FOR **DEFAULT JUDGMENT** 

04 Civ. 2907 (RJH)(GWG)

SOLE CITY, INC., SOLOMON SAFDEYE, ALAN KANDALL, JEFFREY BERNSTEIN and MARC DOLCE,

Defendants.

**PLEASE TAKE NOTICE,** that upon the annexed affidavit of Esther S.

Trakinski, Esq., sworn to on the 7th day of January, 2005, and upon all of the prior proceedings and pleadings heretofore had herein, Gursky & Partners, LLP, attorneys for plaintiff Full Creative, Ltd. d/b/a I.C.B. Asia, Co., Ltd. ("I.C.B. Asia"), hereby moves this Court before the Honorable Gabriel W. Gorenstein, at 40 Center Street, Courtroom 219, New York, New York 10007, for entry of a default judgment against defendant Sole City, Inc., pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure in accordance

with the Court's Order dated November 1, 2004 (the "Order").

Dated: New York, NY January 7, 2005

GURSKY & PARTNERS, LLP

/S/ BY: Ira S. Sacks (IS 2861) Esther S. Trakinski (ET 7791) GURSKY & PARTNERS, LLP 1350 Broadway, 11th Floor

New York, New York 10018

(212) 904-1234

Attorneys for Plaintiff